

REMARKS

Applicants have carefully considered the December 28, 2006 Office Action, and the amendments above together with the comments that follow are presented in a bona fide effort to address all issues raised in that Action and thereby place this case in condition for allowance. Claims 1-14 were pending in this application. Claims 13 and 14 have been withdrawn from consideration pursuant to the provisions of 37 C.F.R. § 1.142(b).

In response to the Office Action dated December 28, 2006, dependent claims 8 and 11 have been canceled and independent claims 1, 5 and 10 have been amended. Care has been exercised to avoid the introduction of new matter. Adequate descriptive support for the present Amendment should be apparent throughout the originally filed disclosure as, for example, the depicted embodiments and related discussion thereof in the written description of the specification. Applicants submit that the present Amendment does not generate any new matter issue. Entry of the present Amendment is respectfully solicited. It is believed that this response places this case in condition for allowance. Hence, prompt favorable reconsideration of this case is solicited.

The Examiner objected to the title of the invention and to two minor informalities at pages 1 and 2 of the specification. Reconsideration and withdrawal of the objections are solicited in view of the foregoing amendments to the specification.

Claims 8 and 11 were rejected under 35 U.S.C. § 112, first paragraph. Applicants respectfully submit that the rejection is moot in view of the cancellation of claims 8 and 11.

Claims 1-12 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Nakahashi et al. (U.S. Pat. No. 5,319,457, hereinafter "Nakahashi") in view of Imaizumi et al. (U.S. Pat. No. 6,816,618, hereinafter "Imaizumi"). Applicants respectfully traverse.

Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge readily available to one of ordinary skill in the art. *In re Kotzab*, 217 F.3d 1365, 1370 55 USPQ2d 1313, 1317 (Fed. Cir. 2000); *In re Jones*, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992); *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988). Applicants respectfully submit that the applied references fail to disclose or remotely suggest the present claimed subject matter as amended.

Independent claim 1 has been amended to describe a method of writing data. The method includes the steps of specifying the size of processed data deriving from each data block when a predetermined processing is performed, in parallel, on a plurality of data blocks. The method includes specifying write-start addresses for the plurality of data blocks by sequentially adding the specified size of processed data. The write-start address is used when the processed data derived from each data block is written to a memory.

Independent claim 5 has been amended to describe a data writing apparatus, wherein the address specifying unit sequentially adds the amount of coded data derived from each data block, so as to sequentially specify the write-start address for each data block. Independent claim 10 has been amended to describe a coding apparatus, wherein the address specifying unit sequentially adds the amount of coded data derived from each data block, so as to sequentially specify the write-start address for each data block.

In the present instance, Applicants respectfully submit that neither Nakahashi alone, or in combination with Imaizumi, discloses or remotely suggests calculating a write address dependent

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on data amount such that write data will be written in a memory in a continuous manner. Accordingly, reconsideration and withdrawal of the rejection are solicited.

It is believed that all pending claims are now in condition for allowance. Applicants therefore respectfully request an early and favorable reconsideration and allowance of this application. If there are any outstanding issues which might be resolved by an interview or an Examiner's amendment, the Examiner is invited to call Applicants' representative at the telephone number shown below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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